## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF TENNESSEE

In re: FLORENCE GRAY BLEVINS Case No. 15-20113-L

Debtor Chapter 13

## MOTION TO APPROVE LOAN MODIFICATION, EXPEDITED HEARING REQUESTED

Comes now the debtor, by and through counsel of record, and for this Motion states:

- 1. The debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on January 6, 2013.
- 2. The debtor included FCI Lender Services as a secured creditor in her original petition. FCI Lender Services holds a mortgage on the debtor's principal residence located at 3346 Dawnridge Dr in Memphis, TN 38118.
- 3. The mortgage is to be paid direct outside the debtor's plan for the ongoing and arrearage payments.
- 4. The debtor has been in contact with the mortgage lender to modify the terms of the note to provide a lower interest rate and lower the monthly payment on the mortgage.
- 5. The debtor proposes that the Court enter an order approving the modification and to modify the terms of the debtor's Chapter 13 plan.

WHEREFORE, the debtor moves the Court to approve the modification with FCI Lender Services and modify the debtor's plan.

.

Respectfully Submitted,

/s/ Herbert Hurst

Herbert Hurst 18721 Hurst Law Firm, P. A. Attorney for Debtor(s) P. O. Box 41497 Memphis, TN 38174-1497 (901) 725-1000

## **CERTIFICATE OF SERVICE**

The undersigned party, attorney for party, or agent therefore, hereby certifies that on or before the 19th day of February, 2015, copies of the above document were electronically mailed, mailed via the United States Postal Service, or hand delivered to the parties listed.

/s/ Joshua Kirk

Joshua Kirk, Paralegal Hurst Law Firm, P. A. Attorney for Debtor P. O. Box 41497 Memphis, TN 38174-1497 (901) 725-1000

NAMES AND ADDRESSES OF ENTITIES SERVED:

Debtor(s)

Chapter 13 Case Trustee

FCI Lender Services, Inc. POB 27370 Anaheim, CA 92809